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13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA

15 BEATRICE BAILIN, an individual,

16 Plaintiff,

17 vs.

18 SELECT PORTFOLIO SERVICING, INC., a
19 Utah Corporation,

20 Defendants.

Case No.: 2:14-cv-00678-GMN-PAL

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22 STIPULATION AND ORDER TO STAY
23 DISCOVERY AND ALL DEADLINES

24 Defendant, Select Portfolio Servicing, Inc. ("Defendant"), by and through its attorneys of
25 record, Dana Jonathon Nitz, Esq., and Natalie C. Lehman, Esq., of the law firm WRIGHT
26 FINLAY & ZAK, LLP, and Plaintiff, Beatrice Bailin ("Plaintiff"), by and through her attorney
27 of records, Mark J. Bourassa, Esq. and Trent L. Richards, Esq., of the BOURASSA LAW
28 GROUP, LLC, and do hereby file the within Stipulation and allege and aver as follows:

- 29 1. Plaintiff filed the instant FDCPA matter against Defendant on or about May 1,
30 2014.
- 31 2. Plaintiff is 89 years of age and already in frail health.
- 32 3. Plaintiff recently suffered a serious fall resulting in numerous injuries and is
33 currently hospitalized.
- 34 4. Defendant noticed the deposition of Plaintiff to be deposed on December 2, 2015.
- 35 5. Due to the nature of Plaintiff's injuries, she is unable to be deposed at this time.
- 36 6. Defendant has agreed to vacate Plaintiff's deposition at this time.

- 1 7. The parties have agreed to stay discovery in this matter for ninety (90) days to
- 2 allow Plaintiff to recover from her injuries sufficiently to be deposed.
- 3 8. The parties further agree that all deadlines predicated upon the current discovery
- 4 deadline shall be stayed.
- 5 9. Notwithstanding this stay, the deposition of Douglas Bailin, the Plaintiff's son,
- 6 who holds her power of attorney, noticed for December 4, 2015, may go forward.
- 7 10. The deposition of Douglas Bailin shall proceed as noticed.
- 8 11. Notwithstanding this stay, nothing in this Stipulation will preclude any party from
- 9 seeking more complete responses to discovery already served.

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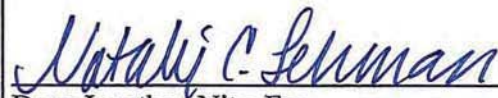
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1 WHEREFORE, the parties hereby stipulate that discovery shall be stayed for ninety (90)
2 days and that all deadlines predicated upon the current discovery deadline shall be stayed.

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4 DATED this 4th day of December 2015.

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6 WRIGHT, FINLAY & ZAK, LLP

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THE BOURASSA LAW GROUP, LLC




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16 **ORDER**

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18 **Based on the above and good cause appearing, IT IS SO ORDERED.**

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20 Dated this 4th day of January, 2016.

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22 **UNITED STATES MAGISTRATE JUDGE**

23 **Case No. 2:14-cv-00678-GMN-PAL**
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